UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

RIPPLE LABS, INC., BRADLEY GARLINGHOUSE, and CHRISTIAN A. LARSEN,

Defendants,

and

JORDAN DEATON, JAMES LAMONTE, TYLER LAMONTE, MYA LAMONTE, MITCHELL MCKENNA, KRISTIANA WARNER and ALL SIMILARLY SITUATED XRP HOLDERS,

Proposed Intervenor-Defendants.

MOTION TO INTERVENE PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 24

20-cv-10832 (AT) (SN) (S.D.N.Y.)

ORAL ARGUMENT REQUESTED

NOTICE OF PROPOSED INTERVENOR-DEFENDANTS' MOTION TO INTERVENE

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Proposed Intervenor-Defendants, Jordan Deaton, James Lamonte, Tyler Lamonte, Mya Lamonte, Mitchell Mckenna, Kristiana Warner and all other similarly situated XRP holders' ("XRP Holders") Motion to Intervene, the Declaration of John E. Deaton, the Notice of Motion, and such other and further papers and proceedings as may be filed or had, XRP Holders will respectfully move this Court before the Honorable Analisa Torres, United States District Judge, Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, Courtroom 15D, New York, New York 10007, at a time and date to be determined by this Court, for an order granting leave to intervene in the above-captioned case as of right under Federal Rules of Civil Procedure 24(a), or

in the alternative, as a matter of permissive intervention under Federal Rule of Civil Procedure 24(b).

Dated: April 19, 2021

East Providence, Rhode Island

Respectfully submitted,

THE DEATON LAW FIRM, LLC.

/s/John E. Deaton

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Defendants